

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
U.S. Department of the Interior  
Bureau of Land Management

---

OFFICE: Humboldt River Field Office, LLNVW01000

TRACKING NUMBER: **DOI-BLM-NV-W010-2014-0040-DNA**

CASEFILE/PROJECT NUMBER: Sonoma – H91X

PROPOSED ACTION TITLE/TYPE: Sonoma (H91X) Fire Emergency Stabilization  
and Rehabilitation Plan

LOCATION/LEGAL DESCRIPTION:

*Ground Seeding*

T. 34 N., R. 39 E., sec. 27, 28, 33, 34

*Invasive species Mgmt.*

T. 34 N., R. 39 E., sec. 27, 28, 33, 34

APPLICANT (if any): Bureau of Land Management (BLM)

**Background Information on Fire**

The Sonoma Fire was ignited by lightning on 7/31/2014 and contained on 7/31/2014. The Sonoma Fire occurred in the Sonoma Mountains. The fire area burned previously in the Clear Creek Fire in 2001. The entire fire area is classified as Greater Sage Grouse Preliminary Priority Habitat (PPH), mule deer crucial summer habitat, and year-round pronghorn habitat as defined by the Nevada Department of Wildlife. The area is also heavily utilized by assorted small mammals, migratory birds, and is near raptor nesting sites. The loss of shrub cover and nesting and foraging habitat has occurred as a result of the fire. *Eriogonum anemophilum*, windloving buckwheat, a Nevada BLM sensitive species, has been identified in the adjacent mountains, and its habitat could be threatened due to increasing populations of non-native annual plants caused by the Sonoma Fire.

The fire occurred on a south-west facing slope along the east side of the Sonoma Mountains. The fire burned within one soil map unit containing three soil components. The soil map unit is identified as having a high potential for water erosion and is at risk from accelerated soil loss due to the loss of vegetation.

The three soil components are associated with three different rangeland ecological sites. The possible rangeland ecological sites are R024XY029NV, a south slope site receiving 12-16" of precipitation annually, R024XY27NV, a claypan site receiving 12-16" of

precipitation annually, and R024XY032NV, a loamy slope site receiving 14+” precipitation annually.

Rangeland Ecological Site	The vegetation community in reference condition, is typically dominated by:
R024XY029NV	mountain sagebrush ( <i>Artemisia tridentata</i> ssp. <i>vaseyana</i> ) and bluebunch wheatgrass ( <i>Pseudoroegneria spicata</i> ).
R024XY27NV	little sagebrush ( <i>Artemisia arbuscula</i> ), Idaho fescue ( <i>Festuca idahoensis</i> ), and bluebunch wheatgrass.
R024XY032NV	mountain sagebrush, mountain brome ( <i>Bromus marginatus</i> ), and Idaho fescue.

The fire burned a total of 75 acres, with 59 acres of BLM-administered public lands, within the Rock Creek Grazing Allotment, and 16 acres of private land. It is estimated that closure to livestock use of the lands affected by the fire would reduce annual use in the Rock Creek Grazing Allotment by 4 Animal Use Months (AUMs).

**A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.**

Ground Seeding

The BLM proposes to hand seed or broadcast a total of 59 acres of public land managed by BLM that was burned. Seeding would occur in fall or winter with a preference for application in late fall or early winter. The project would be seeded with mountain sagebrush (*A. tridentata* ssp. *vaseyana*) and bluebunch wheatgrass (*P. spicata*).

Objectives for ground seeding are as follows:

1. Obtain an average of 0.5 seeded plants per meter<sup>2</sup> by the end of the third year following fire containment, which occurred on 07/31/2014.
2. Obtain 50% or greater perennial cover of the low potential perennial plant cover for the appropriate ecological site by the end of the third year following fire containment.
3. The ground seeding would result in lower abundance (density and cover) of invasive annual plant species and a higher abundance of desirable perennial plant species than the unseeded control areas.
4. Seeded species would be well established and reproducing.

Invasive Plants and Noxious Weeds Management

Manage invasive species within the fire-affected area to limit further infestation through active treatment of previously existing and newly established infestations of noxious weeds. Up to 59 acres of noxious weed infestations would be treated annually during 2015, 2016, and 2017.

Located infestations, if any, would be treated with BLM approved herbicides as appropriate, and in compliance with BLM operating procedures and label requirements

for BLM approved herbicides. Localized treatments may include one or more of the following chemicals depending on species present in project location:

Imazapyr  
Glyphosate  
2,4-D  
Picloram  
Dicamba  
Metsulphuron methyl  
Clorsulphuron

Herbicides would be applied with crews utilizing backpack pumps to spray noxious weeds or annual invasive species. All infestations and treatments would be tracked in District GIS layers/shapefiles.

### **Environmental Protection Measures**

The applicable design measures for this proposal are listed below. The existing NEPA documents are listed under section C.

All treatments identified will be in accordance with Instruction Memorandum IM-NV-2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014), and WO-IM-2014-114 Sage Grouse Habitat and Wildland Fire Management (July 2014).

### Ground Seeding

#### *Monitoring*

All treatments would be monitored for efficacy and efficiency using established protocols and design features that are outlined in the Normal Year Fire Rehabilitation Plan Environmental Assessment No.NV-020-04-21 (DR/FONSI 8/19/2004). All vegetation treatments would be monitored for effectiveness using point-intercept, gap intercept and frame density techniques modified from Monitoring Manual for Grasses, Shrublands, and Savanna Ecosystems (Herrick, et, al., 2005) techniques outlined in BLM Technical Reference 1734-4 (BLM 1996), to determine perennial cover, and density of seeded and non-seeded plant species during the three years following fire containment on these areas.

### Invasive Plants and Noxious Weeds Management

#### *Wildlife and Migratory Birds*

Applicable measures from the Winnemucca Wildland Urban Interface (WUI) Fuels Treatment Project Environmental Assessment No.NV-WO10-2010-0011-EA (DR/FONSI 9/20/2010):

Application of herbicide would not occur within ¼ mile of any known sage grouse lek sites.

Applicable measure from the Holloway Fire ESR DNA DOI-BLM-NV-WO10-2013-0015-DNA (DR12/27/2012):

During the raptor breeding season, January 1 through August 31, control of noxious weeds would be implemented or delayed in accordance with spatial and temporal recommendations defined in the Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances (USFWS 2002).

Control of noxious weeds would not be conducted within 0.6 miles of active Sage Grouse leks during lekking and nesting season from March 1<sup>st</sup> through June 30<sup>th</sup>. Greater Sage-Grouse nest and brood surveys in areas proposed for noxious weeds control efforts will be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. If active nests and/or broods are located, rehabilitation activities will be delayed until the grouse have voluntarily left the area.

#### *Herbicide application*

The use of herbicides listed would adhere to the environmental protection measures listed below from the Integrated Weed Management Environmental Assessment NV-020-02-19 (DR/FONSI 8/27/2002).

1. Standard safety procedures and standard operating procedures would be strictly followed.
2. Re-applications of the herbicide would not be less than the persistence factor identified for any product selected for use.
3. Ground applications of herbicides (including backpack and power sprayer) would be limited to spraying the target weeds and the surrounding ground for 10 feet. Backpack applications of liquids would occur only at low nozzle pressure and at ground level. Granular formulations would be applied by broadcast spreaders or by hand within 3.5' of the ground.
4. The BLM would notify the livestock grazing permittee(s) when herbicides are used on grazing allotments. Phenology of target species and multiple use objectives would also be considered.
5. No herbicide application would be conducted when rain (greater than 50% chance) is predicted within 24 hours of treatment. The BLM would use the Interagency Fire Dispatch Center for weather reports for rain predictions.
6. All herbicide spray solutions would be applied with a blue dye so that application sites are visible.

### **B. Land Use Plan (LUP) Conformance**

LUP Name\* Sonoma-Gerlach Management Framework Plan (MFP)

Date Approved: 1982

\*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)

**The proposed action in conformance with the applicable LUP because it is specifically provided for the following LUP decisions:**

The proposed treatments are in conformance with the Sonoma-Gerlach MFP, .45 Soil-Water-Air which states in part;

1. “Consider rehabilitating areas which have had protective vegetative cover destroyed by wildfire.....” “Utilize seed and other watershed stabilization techniques as required.”
2. “Increase existing forage by artificial methods wherever appropriate. Land treatment is defined as vegetation manipulation (i.e. plowing, burning, spraying and/or seeding).”

**The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objective, terms, and conditions):**

**Sonoma-Gerlach MFP (1982)**

Although not specifically addressed, stabilization and rehabilitation treatments conform to wildlife and watershed objectives WL-1, which state in part; “Provide for improvement or maintenance of wildlife habitat in the planning area in order to assure that sufficient quantity, quality and diversity of habitat exists to accommodate the needs of all species of wildlife...”

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

- Winnemucca Wildland Urban Interface Area Treatment Project Environmental Assessment, DOI-BLM-NV-WO10-0011-EA, (DR/FONSI 9/20/2010)
- Vegetation Treatment Using Herbicides on BLM Lands in Seventeen Western States Programmatic Final Environmental Impact Statement, 07/2007, (ROD 9/29/07)
- Normal Year Fire Rehabilitation Plan Environmental Assessment EA# NV-020-04-21, 06/2004, (DR/FONSI 8/19/04)
- Integrated Weed Management Environmental Assessment NV-020-02-19, 8/07/02, (DR/FONSI 8/27/02)
- Vegetation Treatment on BLM Lands in Thirteen Western States Environmental Impact Statement, 05/91, (ROD 8/91)

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- IM NV 2014-022 Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat (July 2014)
- WO IM 2014-114 Sage-Grouse Habitat and Wildland Fire Management (July 2014)

- Holloway Fire ESR Determination of NEPA Adequacy DOI-BLM-NV-WO10-2013-0015-DNA (DR 12/27/2012)
- USFWS Biological Opinion for the Normal Year Fire Rehabilitation Plan (August 2004)
- A Report on National Greater Sage-Grouse Conservation Measures. Produced by: Sage-grouse National Technical Team, 12/21/2011 (pp 27)

#### **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Documentation of answer and explanation:

Yes, the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), addresses the proposed treatments including drill seeding, broadcast seeding, aerial seeding and installation of temporary fencing. Control of noxious weeds is analyzed in the Normal Fire Rehabilitation Plan EA-NV-020-04-21 (DR/FONSI 8/19/04), Integrated Weed Management EA-NV-020-02-19 (DR/FONSI 8/27/02) and the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States EIS (ROD 9/29/07).

**2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Documentation of answer and explanation:

Yes, the range of alternatives analyzed in the existing NEPA documents are appropriate with respect to the current proposed action and current environmental concerns, interests, resource values and circumstances.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Documentation of answer and explanation:

Yes, the existing analysis is adequate and there is no new information or circumstances regarding the current proposal that would necessitate new analysis. Recent BLM NV State Office guidance (IM-NV-2011-044) related to Greater Sage Grouse has designated specific habitat in Nevada as Preliminary Priority Habitat (PPH) and Preliminary General Habitat (PGH) if it meets specified criteria for breeding habitat. Any project that falls within PPH or PGH must include additional correspondence and evaluation steps,

including coordination and review by the Nevada Department of Wildlife (NDOW). The Sonoma Fire ES&R activities falls within PPH; correspondence with the NV State Office and NDOW was initiated and the proposed action was reviewed and approved by NDOW and BLM Wildlife Biologists. Based on this process, we can reasonably conclude that the recent Greater Sage Grouse guidance would not substantially change the analysis of this proposed action.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Documentation of answer and explanation:

Yes, the analytical approach used in the existing NEPA documents continues to be appropriate for the current proposed action.

**5. Is the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Documentation of answer and explanation:

Yes, public involvement and interagency review associated with existing NEPA documents are adequate. In addition, coordination regarding the planned Sonoma Fire ESR actions has occurred between the Winnemucca District Range Management Specialist and the affected permittee in the form of a meeting on 9/16/2014.

**DOI-BLM-NV-W010-2014-0040-DNA**

**E. Persons/Agencies/BLM Staff Consulted**

<b>Name /Title</b>	<b>Resource/Agency Represented</b>	<b>Signature/Date</b>	<b>Comments (Attach if more room is needed)</b>
Wes Barry	Range Management Specialist	/s Wes Barry 9/22/2014	
Rob Burton	Vegetation/Soils/Air Quality	/s Rob Burton 9/15/2014	
Chris Powell	Cultural Resources	/s Chris Powell 9/15/2014	No ground disturbance
Pat Haynal	Cultural Resources (oversight)	/s Pat Haynal 9/24/2014	
John McCann	Hydrology/Riparian	/s John McCann 9/15/2014	
Amanda DeForest	Wildlife	/s Amanda DeForest 9/23/2014	
Greg Lynch	Fisheries	/s Greg Lynch 9/24/2014	
Rob Bunkall	GIS	/s Rob Bunkall 9/15/2014	
Eric Baxter	ESR Lead/Invasive Species/NAC	/s Eric Baxter 10/21/2014	
Lynn Ricci	NEPA	/s Lynn Ricci 10/22/2014	
Samantha Gooch	Wild Horse/Burro	/s Samantha Gooch 9/15/2014	none
Zwaantje Rorex	Lands w/ Wilderness Characteristics/ WSA	/s Zwaantje Rorex 9/17/2014	
Mark Williams	Fire/Fuels	/s Mark Williams 9/18/0214	none
Pat Haynal	Paleontology	/s Pat Haynal 9/24/2014	

Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

☒ **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

Eric Baxter 10/21/2014  
Signature of Project Lead

Lynn Ricci  
Signature of NEPA Coordinator

James W. Schroeder 10/23/2014  
Signature of the Responsible Official Date



**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.